

## **U.S. Department of Justice**

United States Attorney Eastern District of New York

PSS:ABK F. #2012R01666

271 Cadman Plaza East Brooklyn, New York 11201

February 4, 2014

## By ECF and First-Class Mail

Kevin J. Keating, Esq. Law Office of Kevin J. Keating 666 Old Country Road Garden City, NY 11530

Re: United States v. Eduard Munteanu

Criminal Docket No. 12-698 (SJF)

Dear Mr. Keating:

The undersigned is firewall counsel in the above-referenced case. Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby produces discovery with respect to this case. This letter supplements the government's discovery letters dated December 18, 2012, February 7, 2013, April 4, 2013, October 4, 2013, October 22, 2013, December 30, 2013, January 7, 2014, January 9, 2014, January 16, 2014, and January 24, 2014.

Enclosed is a compact disc, Bates numbered EM\_SONY\_LAPTOP 000001, containing materials recovered from defendant's computer. Before reviewing any materials contained on the computer, the government instituted firewall procedures. Pursuant to the firewall procedures, the investigators and prosecutors involved in the investigation and prosecution of the above-referenced case ("the investigative team") have not reviewed or been made aware of the substance of any communications between the defendant and his counsel.

The undersigned firewall counsel has reviewed the materials contained on the computer and determined that no documents or information contained therein are privileged. Accordingly, the compact disc Bates numbered EM\_SONY\_LAPTOP 000001 was provided to the investigative team on February 4, 2014.

Kevin J. Keating, Esq. February 4, 2014 Page 2

Should you have any questions regarding the enclosed materials, please do not hesitate to contact me.

Very truly yours,

LORETTA E. LYNCH United States Attorney

By: /s/Ameet B. Kabrawala
Ameet B. Kabrawala
Assistant U.S. Attorney
(718) 254-6001

## Enclosure

cc: By ECF (without enclosures)

Clerk of Court (SJF)